

At an IAS Part of the Supreme Court  
of the State of New York, held in and  
for the County of New York at the  
Courthouse located at 60 Center Street,  
New York, New York on the  
\_\_\_\_\_ day of \_\_\_\_\_, 2020

Uniformed Fire Officers Association; Uniformed  
Firefighters Association of Greater New York;  
Correction Officers' Benevolent Association of the  
City of New York, Inc.; Police Benevolent  
Association of the City of New York, Inc.; Sergeants  
Benevolent Association; Lieutenants Benevolent  
Association; Captains Endowment Association; and  
Detectives' Endowment Association,

Petitioners/Plaintiffs,

-against-

Bill de Blasio, in his official capacity as Mayor of the  
City of New York; the City of New York; Fire  
Department of the City of New York; Daniel A.  
Nigro, in his official capacity as the Commissioner of  
the Fire Department of the City of New York; New  
York City Department of Correction; Cynthia Brann,  
in her official capacity as the Commissioner of the  
New York City Department of Correction; Dermot F.  
Shea, in his official capacity as the Commissioner of  
the New York City Police Department; the New York  
City Police Department; Frederick Davie, in his  
official capacity as the Chair of the Civilian  
Complaint Review Board; and the Civilian  
Complaint Review Board,

Respondents/Defendants.

Index No.:

**[PROPOSED] ORDER  
TO SHOW CAUSE**

Upon reading of the annexed Verified Petition/Complaint and supporting exhibits, its  
accompanying Memorandum of Law and supporting exhibits, the Affirmation of Andrew Quinn  
in Support of Emergency Relief, dated July 14, 2020, and the Affirmation of Anthony P. Coles,  
dated July 14, 2020, and sufficient cause being alleged, it is hereby:

**ORDERED** that the Respondents/Defendants (“Respondents”) show cause before this Court, at IAS Part \_\_\_\_ of the Courthouse located at 60 Center Street, New York, New York on the \_\_\_\_ day of \_\_\_\_\_, at 9:30 am of that day, or as soon thereafter as counsel can be heard, why an Order should not be made pursuant to CPLR § 6301, on behalf of Petitioners/Plaintiffs (“Petitioners”) Uniformed Fire Officers Association, Uniformed Firefighters Association of Greater New York, Correction Officers Benevolent Association of the City of New York, Police Benevolent Association of the City of New York, Inc., Sergeants Benevolent Association, Lieutenants Benevolent Association, Captains Endowment Association, and Detectives’ Endowment Association, preliminarily restraining Respondents, and those acting in concert with them, from publicly disclosing any records concerning disciplinary matters against individual New York City police officers, firefighters, and corrections officers that are non-final, unsubstantiated, unfounded, exonerated or resulted in a finding of not guilty (“Unsubstantiated and Non-Final Allegations”), or that regard settlement agreements entered into prior to June 12, 2020.

**IT IS FURTHER ORDERED** that pending the hearing scheduled above for the preliminary injunction, a temporary restraining order is hereby issued restraining Respondents, and those acting in concert with them, from publicly disclosing any records concerning Unsubstantiated and Non-Final Allegations or settlement agreements entered into prior to June 12, 2020;

**IT IS FURTHER ORDERED** that service of a copy of this Order to Show Cause and the papers on which it is based, on or before \_\_\_\_\_, 2020, by email correspondence to the designated service e-mail address for the New York City Law Department ([serviceECF@law.nyc.gov](mailto:serviceECF@law.nyc.gov)), together with delivery by mail of a hard copy of those same

documents to the Law Department's main office at 100 Church Street, New York, NY 10007, shall be deemed good and sufficient service on Respondents' counsel;

**IT IS FURTHER ORDERED** that Petitioners are permitted to serve expedited document discovery requests, limited to no more than ten numbered, written document requests, and that Respondents shall produce documents responsive to the requests within \_\_\_\_ days of service of the requests, so that Petitioners can review the documents before the return date stated above for a hearing on Petitioners' request for a preliminary injunction;

**IT IS FURTHER ORDERED** that the Respondents' opposition papers, if any, are to be served on Petitioners' counsel via NYSCEF and e-mail ([anthony.coles@dlapiper.com](mailto:anthony.coles@dlapiper.com)), on or before the \_\_\_\_ day of \_\_\_\_\_ 2020;

**IT IS FURTHER ORDERED** that the Petitioners' reply papers, if any, shall be served via NYSCEF and e-mail ([serviceECF@law.nyc.gov](mailto:serviceECF@law.nyc.gov)), on or before the \_\_\_\_ day of \_\_\_\_\_ 2020.

Signed, this \_\_\_\_ day of \_\_\_\_, New York, New York:

ENTER:

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J.S.C.